

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on December 5, 2005.

Permit Number: **R30-07300003-2002**
Application Received: **August 11, 2009**
Plant Identification Number: **07300003**
Permittee: **CYTEC Industries Inc.**
Facility Name: **Willow Island Plant**
Manufacturing Unit: **Polymer Additives (Part 4 of 5)**
Mailing Address: **#1 Heilman Avenue, Willow Island, WV 26134-9801**

Permit Action Number: MM07 Revised: December 7, 2009

Physical Location:	Willow Island, Pleasants County, West Virginia
UTM Coordinates:	473.4 km Easting • 4,356.2 km Northing • Zone 17
Directions:	Facility is located on State Route 2, two miles south of Belmont, WV.

Facility Description

CYTEC Industries is a global, research-based specialty chemical company. The company operates a multi-product, multi-process chemical plant at Willow Island, WV. The Polymer Additives Manufacturing Unit manufactures ultraviolet light absorbers, antioxidants and anti-static agents. The light absorbers are used in all types of plastics (bottles, telephones, lawn furniture, auto parts), in coatings, and in sunscreens. Antioxidants are used in man-made fibers, rubber products, plastics, and in medical applications. Anti-static agents are used in the electronics industry, in copy machine toner, and in textile applications.

Emissions Summary

There are no emissions changes associated with the proposed modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (HAPs). Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (HAPs), CYTEC Industries Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Preconstruction permits for minor sources.
	45CSR30	Operating permit requirement.

State Only: None.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2156K	September 24, 2009	NA

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

This Title V minor modification, R30-07300003-2002 (Part 4 of 5) – MM07, includes the following:

1) **Changes approved under R13-2156K, issued on September 24, 2009.**

Section	Revisions
1.0	Additions, deletions, and edits due to minor equipment changes within the existing Product/Process Area emission groups. Change of Active R13 Permits from R13-2156J to R13-2156K
2.0	No changes.
3.0	No changes.
4.0	Condition 4.1.6 – revise vents with Rule 7 applicability due to minor equipment changes within the existing Product/Process Area emission groups.
Appendix A	Revise various Emission Group references due to minor equipment changes.
Appendix B	No changes

2) **Other changes include:**

Section	Revisions
1.0	No changes.
2.0	No changes.
3.0	Conditions 3.5.3 and 3.5.5 have been modified due to EPA's request that all compliance certification forms be submitted electronically.
4.0	Condition 4.1.9.3 – The reduction of organic HAP emissions for Group 1 batch process vents that go to recovery devices has been changed from $\geq 98\%$ to $\geq 95\%$. This is the correct number specified by Table 2 (1.b) to Subpart FFFF.
Appendix A	Add reference of Subpart FFFF applicability to two scrubbers.
Appendix B	No changes

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

N/A

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Mike Egnor
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, S.E.
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Mike Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

N/A